

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:	§	
	§	
GOODMAN NETWORKS, INC.,	§	Case No. 22-31641-mvl7
	§	(Chapter 7)
Debtor.	§	
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	§	
SCOTT M. SEIDEL, TRUSTEE, <i>et al.</i> ,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adv. No. 23-03036-mvl
	§	
JAMES FRINZI, <i>et al.</i> ,	§	
	§	
Defendants.	§	

**JOINT MOTION TO CONTINUE HEARING ON MOTION TO COMPEL**

TO THE HONORABLE MICHELLE V. LARSON, U.S. BANKRUPTCY JUDGE:

NOW COME plaintiffs Scott Seidel, as chapter 7 trustee (the “Trustee”) for Goodman Networks, Inc., GNET ATC, LLC, and Multiband Field Services, Inc. (collectively, the “Plaintiffs”), along with defendants James Frinzi (“Mr. Frinzi”), Multiband Global Resources, LLC (“MGR”), and the Frinzi Family Trust (collectively, the “Defendants”), and file this *Joint Motion to Continue Hearing on Motion to Compel*, in support of which they would respectfully show as follows:

1. On October 25, 2023, the Plaintiffs filed their *Plaintiffs’ Motion to Compel Discovery Responses and Production from Defendant Multiband Global Resources, LLC* (Dkt. No. 22, the “Motion to Compel”), which they originally set for hearing on November 21, 2023 (the “Hearing”).

2. As a result of MGR retaining new counsel, the Plaintiffs agreed to continue the Hearing to December 20, 2023. While MGR has begun to produce documents, various issues remain unresolved in connection with the Motion to Compel. For example, and without limitation, MGR has not produced any bank statements.

3. Mr. Frinzi and MGR have represented to the Trustee that (a) they have requested the bank statements from JPMorgan Chase; (b) JPMorgan Chase has informed them that the bank statements have been mailed; and (c) they will produce the bank statements promptly upon receipt. Mr. Frinzi and MGR reaffirm those representations by their counsel's signature to this motion.

4. Under these circumstances, and based on these representations, the Plaintiffs have agreed to continue the Hearing another 30 days to allow the parties more time to resolve all outstanding issues consensually.

WHEREFORE, PREMISES CONSIDERED, the Plaintiffs and the Defendants respectfully request that the Court continue the hearing approximately another 30 days.

RESPECTFULLY SUBMITTED this 19th day of December, 2023.

/s/ Julian P. Vasek

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